

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	3:18-CR-097
	:	
v.	:	(Judge Mariani)
	:	
ROSS ROGGIO	:	(Electronically Filed)

MOTION TO MODIFY CONDITIONS OF RELEASE

AND NOW comes the Defendant, Ross Roggio, by his attorney Melinda C. Ghilardi, Assistant Federal Public Defender, and files the following Motion to Modify Condition of Release. In support thereof, it is averred as follows:

1. On March 20, 2018, Ross Roggio was charged in an Indictment with conspiracy to commit an offense against the United States, in violation of 18 U.S.C. § 371; violations of the Arms Export Control Act, 22 U.S.C. § 2778(b) and (c); and the International Emergency Powers Act, 50 U.S.C. §§ 1702 and 1705(c); smuggling goods from the United States, in violation of 18 U.S.C. §§ 554 and 2; wire fraud, in violation of 18 U.S.C. § 1343; and money laundering, in violation of 18 U.S.C. §§ 1956(a)(2)(A) and 2.

2. On March 23, 2018, Mr. Roggio appeared before Magistrate Judge Karoline Mehalchick for an initial appearance and arraignment. The Federal Public Defender was appointed to represent Mr. Roggio.

3. On April 3, 2018, Mr. Roggio was released on pretrial services supervision to include a condition of home detention with electronic monitoring.

4. The government indicated at the initial appearance and arraignment that it would revisit the home detention with electronic monitoring portion of Mr. Roggio's pretrial release at a later date.

5. Since his release, Mr. Roggio has abided by all of the terms and conditions of supervision.

6. The government requests that Mr. Roggio have regular "check in" communications with the U.S. Probation Office from a landline.

WHEREFORE, the Defendant, Ross Roggio, respectfully requests that this Honorable Court modify the conditions of his pretrial release to eliminate the condition of home detention with electronic monitoring.

Respectfully submitted,

Date: May 25, 2018

s/Melinda C. Ghilardi

Melinda C. Ghilardi

Assistant Federal Public Defender

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Attorney for Ross Roggio

CERTIFICATE OF SERVICE

I, Melinda C. Ghilardi, Assistant Federal Public Defender, do hereby certify that this document, the foregoing **Motion to Modify Conditions of Release**, filed electronically through the ECF system, will be sent to the registered participants as identified on the Notice of Electronic Filing (NEF), including the following:

Todd K. Hinkley, Esquire
Assistant United States Attorney

and by placing the same in the United States mail, first class, postage prepaid, at Scranton Pennsylvania, addressed to the following:

Mr. Ross Roggio

Date: May 25, 2018

s/Melinda C. Ghilardi

Melinda C. Ghilardi
Assistant Federal Public Defender